

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI**

Voice Tech Corporation,

Plaintiff,

vs.

Mycroft AI Inc.,

Defendant.

Case No. 4:20-cv-00111-RK

Jury Trial Demanded

**PLAINTIFF VOICE TECH CORPORATION'S
MOTION FOR RELIEF TO REQUIRE
DECOROUS AND CIVIL CONDUCT BY THE PARTIES**

Plaintiff Voice Tech Corporation (“Voice Tech”) files this Motion against Defendant Mycroft AI, Inc. (“Mycroft”) to request basic relief that the Court should not need to be called upon to provide: the issuance of an Order requiring decorous and civil conduct by the parties to this action. In support of its Motion, Voice Tech respectfully files its Suggestions in Support and submits its Proposed Order concurrently herewith. Regrettably, as further set forth in Voice Tech’s accompanying Suggestions in Support of this Motion, the Court’s intervention to set baseline expectations for the parties’ behavior in relation to this matter is necessary because, in reaction to the claims against it, Mycroft’s CEO/First Officer embarked on a retaliatory campaign against Voice Tech’s counsel, which has included public threats of death and bodily harm, identity theft, and harassment. Establishing minimum requirements for civil conduct, is, thus, necessary not only to protect counsel (and his family), but also to enable a just and orderly opportunity for this Court and the parties to proceed in the case. As such, it is well within this Court’s inherent authority to

grant the relief requested, and Voice Tech respectfully submits that it is, unfortunately, necessary and appropriate that the Court do so.¹

WHEREFORE, Voice Tech hereby moves that the Court issue an order in the form to be provided to the Court by Voice Tech via email, and Order the relief set forth therein, to wit: directing Mycroft, its CEO/First Officer, and others acting on its behalf to cease and desist from harassing and threatening behavior toward Voice Tech, its personnel, and its counsel (including without limitation by removing comments that have been published on Mycroft's website threatening, suggesting, and/or inciting violence and death to Voice Tech's counsel); requiring civil and decorous conduct in relation to this action going forward; and placing Mycroft on notice that the Court may impose additional sanctions and consequences in the event it does not comply with the Court's order.

Dated: April 2, 2020.

Respectfully submitted,

BERKOWITZ OLIVER LLP

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-and-

¹ Given the nature and seriousness of the situation, Voice Tech strongly believes that an Order from the Court is required. Concurrently with this filing, however, Voice Tech's counsel is sending the letter attached hereto as Exhibit 1 to Mycroft's counsel seeking their consent to the Court's entry of the Order, and requesting their support to encourage their client to curb its conduct and behave civilly going forward in conformance with the terms of the Proposed Order.

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ATTORNEYS FOR PLAINTIFF
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CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of April 2020, the above and foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's ECF system upon the following:

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